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March 28, 2024

Honorable Magistrate Judge Arbuckle
United States District Court
Middle District of Pennsylvania
240 West Third Street
Williamsport, PA 17701

RE: *United States v. Thomas Green;*
Case No. 4:24-mj-00023-WIA

Dear Judge Arbuckle:

This letter is offered to the Court in lieu of a more formal brief in the above-captioned case to address the issue of detention ahead of today's detention hearing.

It is the understanding of the Government that United States Probation Officer recommends the defendant be detained because there is no condition or combination of conditions that will reasonably assure the appearance of the defendant as required and the safety of the community. That recommendation is based on several factors, including: (1) the nature of the offenses charged (several specific, violent threats to the FBI); (2) prior criminal activity and noncompliance while under supervision; and (3) the defendant's social history and health-

related concerns. The government concurs in and defers to the Probation Officer's recommendation.

Should the Court disagree with the recommendation and order the defendant's release, the Government would request the defendant be released on the following conditions in addition to the standard pretrial conditions:

- (1) The defendant receives mental health treatment;
- (2) The defendant is prohibited from contacting the Federal Bureau of Investigation; and
- (3) The defendant wear an ankle monitor.

Accordingly, the Government respectfully submits the above recommendation regarding detention.

Sincerely,

GERARD M. KARAM
United States Attorney

By: /s/ Kyle A. Moreno
KYLE A. MORENO
Assistant United States Attorney

cc: Jerry Lord, Esq.